

MBO, LLC PER 20080001
MAIN FILE

November 20, 2009

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PNAR

Mr. Eura DeHart
Water Permits Division
Louisiana Department of Environmental Quality
P.O. Box 4314
Baton Rouge, Louisiana 70821-4313

**RE: INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION
MBO, LLC D/B/A LACASSINE OILFIELD SERVICES
19141 GRO RACCA ROAD, IOWA, LA 70647
JEFFERSON DAVIS PARISH, LOUISIANA – AI NUMBER 152245 ✓
SUPPLEMENTAL INFORMATION FOR ENVIRONMENTAL IMPACT QUESTIONNAIRE**

Dear Mr. DeHart:

MBO, LLC (MBO) submits the attached supplemental information to the questions contained on Page 23 of 25, Section VII – “Environmental Impact Questionnaire” of MBO’s application to the Louisiana Department of Environmental Quality (LaDEQ) for an Industrial Wastewater Discharge Permit.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that the qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

If you have any questions or comments please contact me at 832-229-5605.

Sincerely,



David Turkal
President

cc: Mark Roth – Golder Associates Inc.
Phil Thibodeaux – MBO, LLC

DEQ - OES
2009 NOV 30 PM 2:00

SUPPLEMENTAL INFORMATION

SECTION VII - ENVIRONMENTAL IMPACT QUESTIONNAIRE

Those applicants that are (1) major new facilities or (2) existing major facilities applying for a substantial modification to their permit must complete this questionnaire.

There is no requirement that the information furnished in response to this questionnaire be certified by a professional engineer or other expert. However, simple "yes" or "no" answers will not be acceptable. A measured response should be given for each question posed, taking into consideration appropriate factors such as: the environmental sensitivity of the area, both for the proposed site and alternative sites; impacts on the economy of the area, both favorable and unfavorable; availability of raw materials, fuels and transportation and the impact of potential sites on their availability and economics; relationship of the facility to other facilities, either within or independent of the company, and the effects of location on these relationships; and other factors which may be appropriate on a case-by-case basis. **(Attach any additional pages if needed.)**

1. Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?

Please refer to the attached page(s) with the answer to Question No. 1.

2. Does a cost benefit analysis of the environmental-impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former?

Please refer to the attached page(s) with the answer to Question No. 2.

3. Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing nonenvironmental benefits?

Please refer to the attached page(s) with the answer to Question No. 3.

4. Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing nonenvironmental benefits?

Please refer to the attached page(s) with the answer to Question No. 4.

5. Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing nonenvironmental benefits?

Please refer to the attached page(s) with the answer to Question No. 5.

DEQ - OES
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SUPPLEMENTAL INFORMATION

Question No. 1: "Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?"

Response: The site is not located within a "V" or "A" zone as determined by flood hazard boundary or rate maps. The site is located in Zone "X", an area determined to be outside the 500-year floodplain (FIRM Panel 65 of 145, Community-Panel Number 220095 0065 B).

A determination was made by the United States Army Corps of Engineers on November 24, 2005 and June 20, 1986 that the site does not contain any wetlands under the jurisdiction of the United States Army Corps of Engineers. The site has had significant construction and operational activities since 2007 which would not allow for the formation of wetlands.

There are no Threatened, Endangered or Candidate Species listed for Jefferson Davis Parish in the Louisiana Pollutant Discharge Elimination System Current Endangered Species Listing.

The site was issued a Water Discharge Permit (Permit Number WP4671), in March 1995, for similar operations. The Water Discharge Permit (Permit Number WP4671) was voluntarily terminated in 2000. The site presently has a Storm Water General Permit for Construction Activities – Five Acres or More under General Permit Number LAR100000.

The site is properly zoned for the activities at the facility. The facility started construction activities in December 2007 and began operations in May 2008.

There is a community water system located north of the facility. The water system is approximately 1.5 miles up gradient from Outfall 001 (discharge location). Since the community water system is 1.5 miles up gradient there can be no impact to the water system from the discharge of surface water at Outfall 001.

The site has nine groundwater monitoring wells which are sampled and analyzed quarterly under the regulations of the Department of Natural Resources Office of Conservation. All monitoring wells are up gradient of Outlet 001 (discharge location). Discharges out of Outlet 001 will not impact the groundwater monitoring wells.

Question No. 2: "Does a cost benefit analysis of the environmental-impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former?"

Response: The local economy of the Lacassine, Welsh, and Iowa area is bolstered by the operations of this facility, by providing jobs to the local residents. Twelve permanent positions are provided by the operations of the facility. Also, the facility utilizes local third parties, including but not limited to, local electricians, plumbers, surveyors, dirt moving contractors, consulting firms, welding shops, equipment and office suppliers, banks, etc.

The local economy is also benefited by increased tax revenues of Jefferson Davis Parish.

Although there is an increase in the amount of traffic on State Highway 101 due to the facility, the cost for maintenance of this road is borne primarily by the State. MBO, LLC believes that the increase to truck traffic on Louisiana Highway 101 is minor, and poses no undue burden to the maintenance costs of the road. The facility works closely with Jefferson Davis Parish on the maintenance of Gro Racca Road from Louisiana Highway 101 to the entrance of the site. The facility presently provides equipment, labor and materials for the maintenance of Gro Racca Road.

Since the facility is located in a sparsely populated and mostly agricultural area in Jefferson Davis Parish and since the facility was in operation from 1994 through 1999 and reopened in 2008, the effect on local property values is expected to be negligible. As an existing and operating facility the impact of issuing a discharge permit will have no impact to property values.

The only negative impact to the local economy would be emergency response cost in the event of an emergency response. Since this is an operating facility the potential for emergency response cost already exist.

SUPPLEMENTAL INFORMATION

Question No. 3: "Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits?"

Response: As an existing and operating facility, there are no alternative projects which would offer more protection to the environment than this facility without unduly curtailing non-environmental benefits.

Question No. 4: "Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing non-environmental benefits?"

Response: As an existing and operating facility, there are no alternative sites which would offer more protection to the environment than this facility site without unduly curtailing non-environmental benefits.

Question No. 5: "Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing non-environmental benefits?"

Response: No supplemental information for Question No. 5